# Emergency Planning & Community Right-to-Know Act Overview

Presented at the 2003 Environmental Training Symposium
11-14 March 2003

U.S. AIR FORCE

Laura Maxwell, P.E.
HQ AF Center for Environmental Excellen
laura.maxwell@brooks.af.mil
210/536-4218

U.S. AIR FORCE

# Overview

- Regulations
- 301-304
- 311-312
- 313 Thresholds & Reporting
- Hot Issues
- New Goals
- Training and References

U.S. AIR FORCE

# Regulations

- **Emergency Planning and Community Right-to-Know Act (EPCRA)**
  - **Title III of the 1986 Superfund Amendments and Reauthorization Act (SARA)**
- **Executive Order (EO) 13148, "Greening the Government Through Leadership in Environmental Management", Apr 2000**
  - **New Goals: 50% Reduction in Toxic Releases by 2006 from 2001 Baseline on "Priority 15"**

# EPCRA - Section 301: Local Emergency Plans

- State Governor creates State Emergency Response Commission (SERC)
- SERC designates emergency planning districts
- Each emergency planning district creates Local Emergency Planning Committee (LEPC)

# EPCRA - Section 301: Local Emergency Plans

- **What Do I DO?**
  - **KNOW who are the SERC and LEPC**
  - **KNOW who on your installation is your LEPC representative or point of contact**

# EPCRA - Section 302: Report Extremely Hazardous Substances

- EPA publishes EHS list and Threshold Planning Quantities (TPQs)
  - Range from 1 to 10,000 lbs
  - List has 356 chemicals
- EPA defines “Facility”
  - Fence to Fence stationary items owned or operated by the same person
- Facilities provide list of EHSs to LEPC & SERC

# EPCRA - Section 302: Report EHS

- **What Do I DO?**
  - **Designate a facility Emergency Coordinator**
  - **Review all EHSs present at the "facility"**
    - **Maximum amount on-site at one time during the year**
  - **Letter to LEPC/SERC that Facility is subject to planning provisions of EPCRA**
  - **Provide info to LEPC for their Emergency Plan**

# EPCRA - Section 303: Coordinate with LEPCs

- **LEPCs prepare comprehensive emergency response plans**
  - **Based on EHS data from Facilities**

# EPCRA - Section 303: Coordinate with LEPCs

- **What Do I DO?**
  - **Coordinate with the LEPC:**
    - **Develop mutual aid agreements**
    - **Coordinate training and exercises**
    - **Community Outreach efforts**
  - **Document any changes to EHSs or POCs**

# EPCRA - Section 304: Report Releases of EHSs & CERCLAs

- **Releases over Reportable Quantity (RQ) be reported to LEPC/SERC**
  - **RQ Levels: 1, 10, 100, 1000, 5000 lbs**
  - **Intent is to catch chemicals that may migrate off-site**
- **List of Chemicals is EHSs and CERCLA chemicals**

# EPCRA - Section 304: Report Releases of EHSs & CERCLAs

- **Similar to requirements of CERCLA Section 103(a), but NOT QUITE**
  - **CERCLA report to National Response Center which triggers the National Response System**
- **"Facility" includes any site or area where hazardous substance has "come to be located"**
  - **Includes vessels, vehicles, pipes, pits, lagoons, wells….**

# EPCRA - Section 304: Report Releases of EHSs & CERCLAs

- **Exemptions**
  - **Exposure to personnel only within Facility**
  - **Federally Permitted releases**
  - **Continuous releases**
  - **Pesticides exempt from CERCLA**
  - **Releases not considered CERCLA "releases"**
  - **Radionuclides**

# EPCRA - Section 304: Report Releases of EHSs & CERCLAs

- **What Do I DO?**
  - **Report release immediately to LEPC and SERC**
    - **Phone, radio, in person, smoke signals, carrier pigeon**
  - **Provide written notification ASAP**
    - **Actions taken to respond and contain**
    - **Anticipated health risks**
    - **Medical advice for exposed individuals**

# EPCRA - Sections 311-312: Storage of Chemicals

- **Provide information on Hazardous Chemicals present above thresholds**
- **OSHA driven**
  - **Thresholds are: HazChem 10,000 lbs, EHSs 500 lbs or TPQ**
  - **See 40 CFR 355**
  - **Submit info to local Fire Dept, LEPC, SERC**

# EPCRA - Sections 311-312: Storage of Chemicals

- **Exemptions**
  - **Solids/Article**
  - **Personal Use**
  - **Lab/Hospital**
  - **Food**
  - **Agriculture**

# EPCRA - Section 311: Reporting MSDSs

- **What Do I DO?**
  - **Submit copy of MSDS or LIST of hazardous chemicals**
- **How?**
  - **Identify all Hazardous Chemicals**
  - **Estimate maximum on-site quantity**
  - **Check against thresholds**

# EPCRA - Section 311: Reporting MSDSs

- **When?**
  - **Within 90 days of exceeding threshold or significant new info**
  - **Some LEPCs/SERCs accept Tier II (312) in place of separate 311 report**

# EPCRA 312: Tier I & II Reports

- **Tier I and Tier II Reports**
  - **Identification of Hazardous Chemicals & Substances exceeding thresholds**
    - **Hazardous Chemicals - 10,000 lbs**
    - **EHSs that are HCs - 500 lbs or the TPQ**
  - **No specific list cited**
    - **Any substance requiring an MSDS**

# EPCRA 312: Tier I & II Reports

- **Tier I and Tier II Reports**
  - **Identification of Hazard Category**
    - **Fire**
    - **Sudden Release of Pressure**
    - **Reactive**
    - **Acute Health Hazard**
    - **Delayed Health Hazard**
- **Tier II requires quantities and locations**

# EPCRA 312: Tier I & II Reports

- **States may have additional reporting requirements**
  - **Tier II forms (may skip Tier I)**
  - **Their own State forms**
  - **Exact Lists in addition to Tier forms**
  - **Exact quantities**
  - **Lower thresholds**
  - **Fees for data entry**

# EPCRA 312: Tier I & II Reports

- **What Do I DO?**
  - **Check maximum quantity of EHSs/etc against thresholds**
  - **File Tier reports for chemicals over thresholds**
- **When?**
  - **1 March, annually**
  - **Within 90 days of change**

# EPCRA 313: Form R Reporting

- **Section 313 requires Facilities that meet chemical thresholds to annually report amounts released**
  - **Routine operations and spills**
  - **Form Rs report RELEASES of TOXIC CHEMICALS to EPA database: The Toxic Release Inventory (TRI)**
- **Data is published for public and special interest groups**

# EPCRA 313: Form R Reporting

- **Toxic Chemical List**
  - **664 chemicals and "delimited" chemicals**
  - **TRI focuses on wastes and processes**
- **"Facility"**
  - **Still Fence to Fence**
  - **Under DOD, each AGENCY responsible for their "piece"of the installation**

# EPCRA 313: Form R Reporting

- **What Do I DO?**
  - **Identify Toxic Chemicals**
  - **Perform Threshold Determinations**
  - **Prepare and submit Form Rs**
  - **Document, Document, Document**
  - **Keep Documents for 5 years**

# EPCRA 313: Thresholds

- **Facility Under SIC Code?**
  - **DOD is Code 9711**
- **Employee Threshold**
  - **10 Full Time Equivalents**
  - **Only an issue in Ranges**
  - **If not up to 10, QUIT. Document decision. Move on.**

# EPCRA 313: Chemical Thresholds

- **Chemical Thresholds**
  - **Listed in the EPCRA List of Lists**
- **First Step: Identify the Chemicals**
  - **ID “pure” chemicals**
  - **ID chemicals as components of mixtures**
  - **ID chemicals created on-site**

# EPCRA 313: Chemical Thresholds

- **Sources of Chemical Information**
  - **Pharmacy data**
  - **Bulk fuels**
  - **Storage tanks**
  - **Fuel System Shop (Hydrazine, Chlorine)**
  - **Compressed Gas Cylinders**
  - **Fire Dept - Halon 1211 and 1301, AFFF**

# EPCRA 313: Chemical Thresholds

- **More Sources of Chemical Information**
  - **Motor Pool, Communications Shop, Life Support, AGE, CE Power Production Shop (Batteries)**
  - **Fabrication Shop (Sheet Metal)**
  - **Environmental, POL (Liquid Oxygen, Liquid Nitrogen)**
  - **Contract/Waste Management (Solvent Cleaning Tanks)**

# EPCRA 313: Chemical Thresholds

- **More Sources of Chemical Information**
  - **Flightline and CE (Deicing compounds)**
  - **Materials purchased on IMPAC cards**
  - **CE (Materials used by state employees on base)**
  - **CE, Base Contracting (Materials brought on-site by Contractors)**
  - **Munitions, EOD, Ranges**

# EPCRA 313: Chemical Thresholds

- **Identify if the Chemical Exceeds the Thresholds**
  - **Manufacturing (Importing) - 25,000 lbs**
  - **Processing - 25,000 lbs**
  - **Otherwise Use - 10,000 lbs**
  - **Persistent Bioaccumulative Toxins (PBTs)**
    - **0.1 grams/10 lbs/ 100 lbs**

# EPCRA 313: Chemical Thresholds

- **Apply Otherwise Use Exemptions**
  - **National Security**
  - **De Minimis**
  - **Article**
  - **Laboratory Activity**
  - **Use Exemptions: Structural, Janitorial, Grounds Maintenance, Motor Vehicle, Personal Use, Intake Water and Air**
  - **Mining**

# EPCRA 313: Calculate Releases

- **Use Best Available Information and Best Estimation Methods**
- **Sources of Information**
  - **Air Emissions Inventory**
  - **Permits**
  - **Waste and disposal reports**
  - **Metrics**

# EPCRA 313: Completing Form R

- **Information Required for Form R**
  - **Chemical name, CAS number**
  - **Maximum amount on-site during year**
  - **Amount released to air, land, water**
  - **Amount transported for disposal, treatment, recycling, energy recovery**
  - **Amount, method and efficiency of waste treatment**
  - **Pollution prevention and chemical recycling activities**

# EPCRA 313: Completing Form R

- **DOD must use the EPA's Electronic Form R Software**
  - **Toxic Release Inventory Made Easy (TRI-ME)**
  - **http://www.epa.gov/tri/**
- **Any NEW FACILITY**
  - **Facility Name must be: U.S. DOD USAF ANYWHERE AFB STATE**

# EPCRA 313: Completing Form R

- **When?**
  - **Mid-May to AFCEE for data quality check**
  - **1 Jul to EPA**
  - **12 Jul to AFCEE for AF Data Roll-Up**
  - **31 Jul to EPA for corrections**

U.S. AIR FORCE

# EPCRA HOT ISSUES

- **Coincidental Manufacture**
- **Contractors and Tenants**
- **Use of NA vice “0”**
- **Persistent Bioaccumulative Toxins (PBTs)**
- **Lead and Lead Compounds**
- **Munitions and Ranges**
- **Fueling Activities**

# EPCRA HOT ISSUES – Coincidental Manufacture

- **Definition: Manufacture of a chemical as a byproduct or impurity as a result of the M, P, O, treatment, disposal of other chemical substances**
- **You cannot exempt coincidental manufacture even if the originating activity was exempt**

# EPCRA HOT ISSUES - Coincidental Manufacture

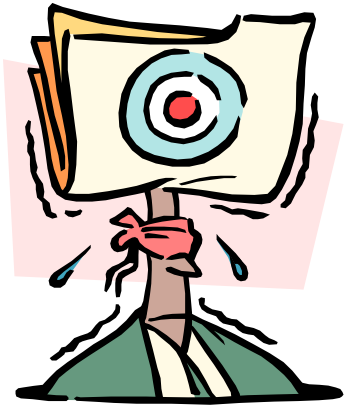
- **Examples**
  - **Wastewater treatment**
    - **Nitrate Compounds**
  - **Combustion of fuels**
    - **Coal - Hydrochloric Acid, Hydrogen Fluoride, Mercury, Dioxins**
    - **No. 2 Fuel Oil - Formaldehyde**
    - **No. 6 Fuel Oil - Polycyclic Aromatic Compounds (PACs), Benzo(G,H,I)perylene**

# EPCRA HOT ISSUES - Coincidental Manufacture

- **Reporting**
  - **Generally, these chemicals are NOT measured**
  - **Use best estimations**
- **If you missed reporting CM chemicals, report as soon as you notice or are told**
  - **Back reporting may be required for any activity EXCEPT Coal Burning**

# EPCRA HOT ISSUES - Contractors & Tenants

- "Facility" is Fence to Fence
- Know ALL sources just to determine THRESHOLD
- Report only your "Part of a Facility" RELEASES
- Enlist cooperation from entities on the Facility



# EPCRA HOT ISSUES - Contractors & Tenants

- General Steps
  - Find their EPCRA POC
  - Compare rough data to determine if thresholds are “vulnerable”
  - If busted, you report/they report
  - If well below threshold, document and QUIT

# EPCRA HOT ISSUES - Contractors & Tenants

- **Basically, encourage participation without requiring more deliverables**
- **Document review**
  - **Emergency plans, hazardous waste reports**
  - **Contract clauses, permits, approvals, registrations**
- **Could take list of “at risk” chemicals to Contractor**
- **Make threshold determination on best available data**

# HOT ISSUES - Definition: NA vs. Zero

## e Form R:

- **"NA" means no pathway for that release type**
  - **Can't get to water if no drain or sewer**
- **"0" if the pathway exists but release did not occur**
  - **Treated to 100% before discharge to water**

EPCRA

U.S. AIR FORCE

# HOT ISSUES - PBTs

- **Persistent Bioaccumulative Toxins (P**

  - **Remain in environment (and the food chain) for long periods of time**
  - **Are not readily destroyed**
  - **Build up (accumulate) in body tissue**
  - **Reporting began in 2001**

# EPCRA HOT ISSUES - PBTs

- **Final Rules**
  - **Thresholds are 0.1 grams (dioxins), 10 lbs, and 100 lbs**
  - **NO De Minimis exemption (< 1.0%)**
  - **NO Range reporting in Sections 5 & 6**
    - **Not a huge deal because DOD is not allowed to use ranges anyway**
  - **Added data reporting precision to Form R software (0.1 lbs)**

# EPCRA HOT ISSUES - PBTs

- How it applies to us
  - Many PBTs are pesticides DOD banned long ago
  - Common PBTs
    - Mercury
    - Polycyclic Aromatic Compounds (PACs)
    - Polychlorinated Biphenyls (PCBs)
    - Lead and Lead Compounds

# EPCRA HOT ISSUES - PBTs

- **Typical Sources**
  - **Thermostats**
  - **Fuel Oils (No. 6 and No 2)**
  - **Coal**
  - **Munitions (Manufacturing, Disassembly, OB/OD, Firing)**
  - **Nondestructive Inspection (NDI) Penetrants**

# EPCRA HOT ISSUES - PBTs

- Accuracy of Pharmacy data
- EPA only requires BEST AVAILABLE INFORMATION
- LEARN FROM EACH OTHER

EPCRA

U.S. AIR FORCE

# HOT ISSUES - Lead and Lead Compounds

- **Final Rules**
  - **Threshold is 100 lbs (sort of)**
  - **NO De Minimis exemption (<1.0%)**
  - **NO alphabet labels for reporting amounts in Sections 5 & 6**
  - **Added data reporting precision to Form R software (0.1 lbs)**

# EPCRA HOT ISSUES - Lead and Lead Compounds

- **Sources**
  - **Electronics**
  - **Sheet metal**
  - **Battery maintenance**
  - **NDI shops**
  - **Ranges**
  - **Sealants, greases, coatings**
  - **Fuels: No.s 2 & 6 oils, Natural gas**

# EPCRA HOT ISSUES - Lead and Lead Compounds

- Exemptions still apply
  - Articles
    - Lead-acid batteries
    - Computer monitors
    - NDI lettering for X-Rays
  - Structural use
    - Metal beams/bricks
    - Coatings & Pavement paint
    - Lead shielding for X-Ray systems

U.S. AIR FORCE

# EPCRA HOT ISSUES - Lead and Lead Compounds

- **Approach**
  - **Take a reasonable course of data gathering**
  - **Document all rationales and findings**
  - **Look for more sources next year**
- **Update your Form R when more sources are found**

# EPCRA HOT ISSUES - Lead and Lead Compounds

- **Thresholds?**
  - **Manufacturing - 25,000 pounds**
  - **Processing - 25,000 pounds**
  - **Otherwise Use - 10,000 pounds**
  - **M, P, OU - 100 pounds**

# EPCRA HOT ISSUES - Lead and Lead Compounds

## Thresholds!

- **ALL Lead Including in Stainless Steel, Brass and Bronze Alloys**
  - **Manufacturing - 25,000 pounds**
  - **Processing - 25,000 pounds**
  - **Otherwise Use - 10,000 pounds**
- **Lead NOT in SS, Brass and Bronze**
  - **M, P, OU - 100 pounds**

# EPCRA HOT ISSUES - Lead and Lead Compounds

- **Example: Facility processes**
  - **20,000 lbs lead in SS alloy and**
  - **275 lbs lead in non-SS/brass/bronze alloy**
- ***Under* the 25,000 lb Processing Threshold**
- ***Over* the 100 lb Processing Threshold**

# EPCRA HOT ISSUES - Lead and Lead Compounds

- **Example: Firing Range Alpha. Data indicates**
  - **130 lbs *lead* and**
  - **80 lbs *lead compounds* Otherwise Used.**
- **Report will be generated for 130 lbs lead**
  - **RELEASE is different than THRESHOLD**
- **Under the 100 lb threshold for lead compounds**

# EPCRA HOT ISSUES - Munitions and Ranges

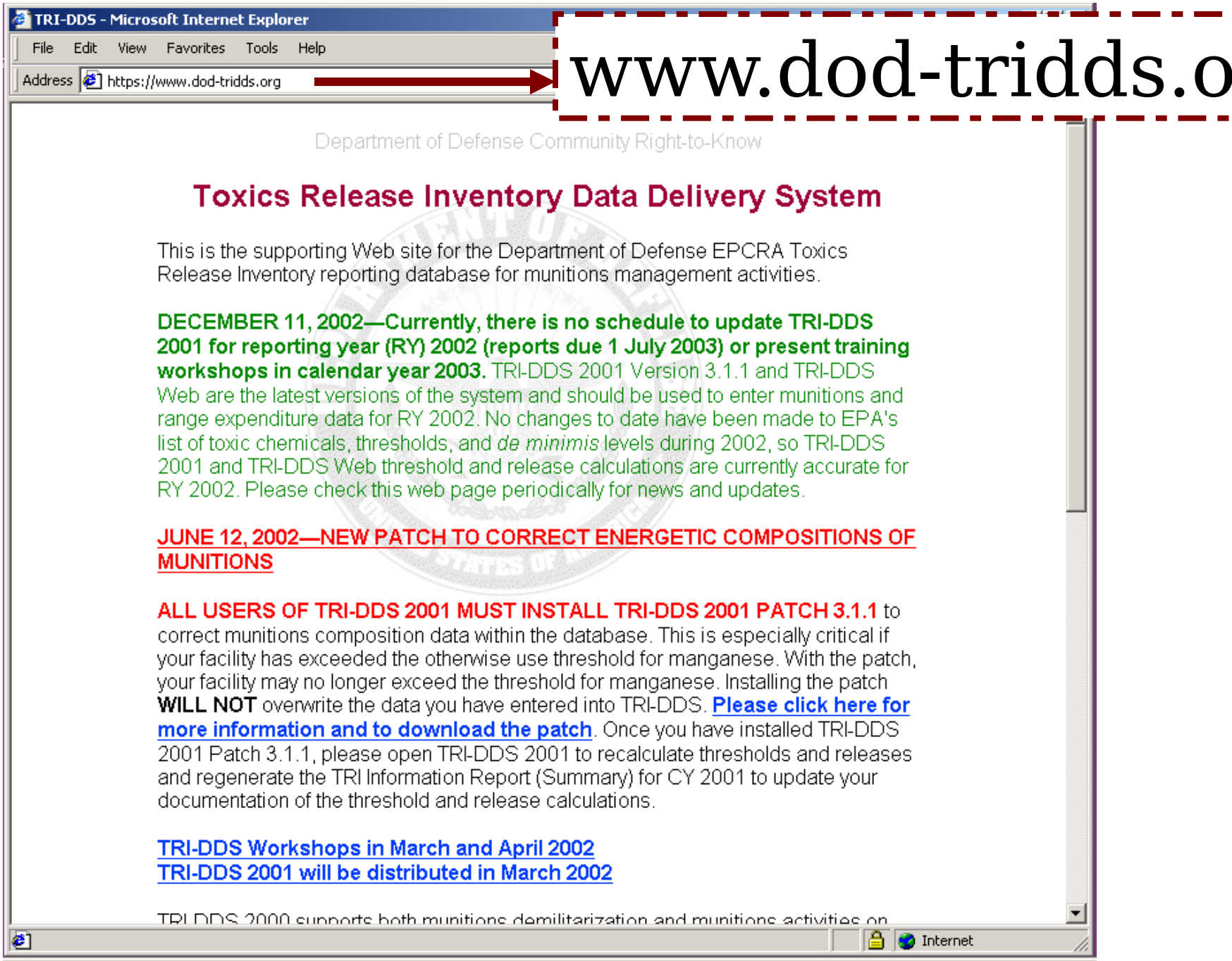
- **Apply EPCRA to Munitions and Ranges**
  - **Data collection**
    - **There are NO “duds”**
  - **Apply Exemptions**
  - **Evaluate against thresholds**
  - **Calculate releases**
- **Follow DOD/AF policy**
  - **Posted on DENIX**

# EPCRA HOT ISSUES - Munitions and Ranges

- **Data Collection and Release Calculations**
  - **TRI-Data Delivery System (TRI-DDS)**
  - **Mandated for DOD use by DUSD(ES), 9 Feb 00**
  - **Generates DATA to assist you in determining thresholds and releases**

# EPCRA HOT ISSUES - Munitions and Ranges

- **TRI-DDS software**
  - **Easy to use**
  - **Gives air/land releases, recycled amounts**
  - **Record keeping by munitions & range personnel is critical**
  - **Recommend using this software for record keeping**
  - **http://www.dod-tridds.org**

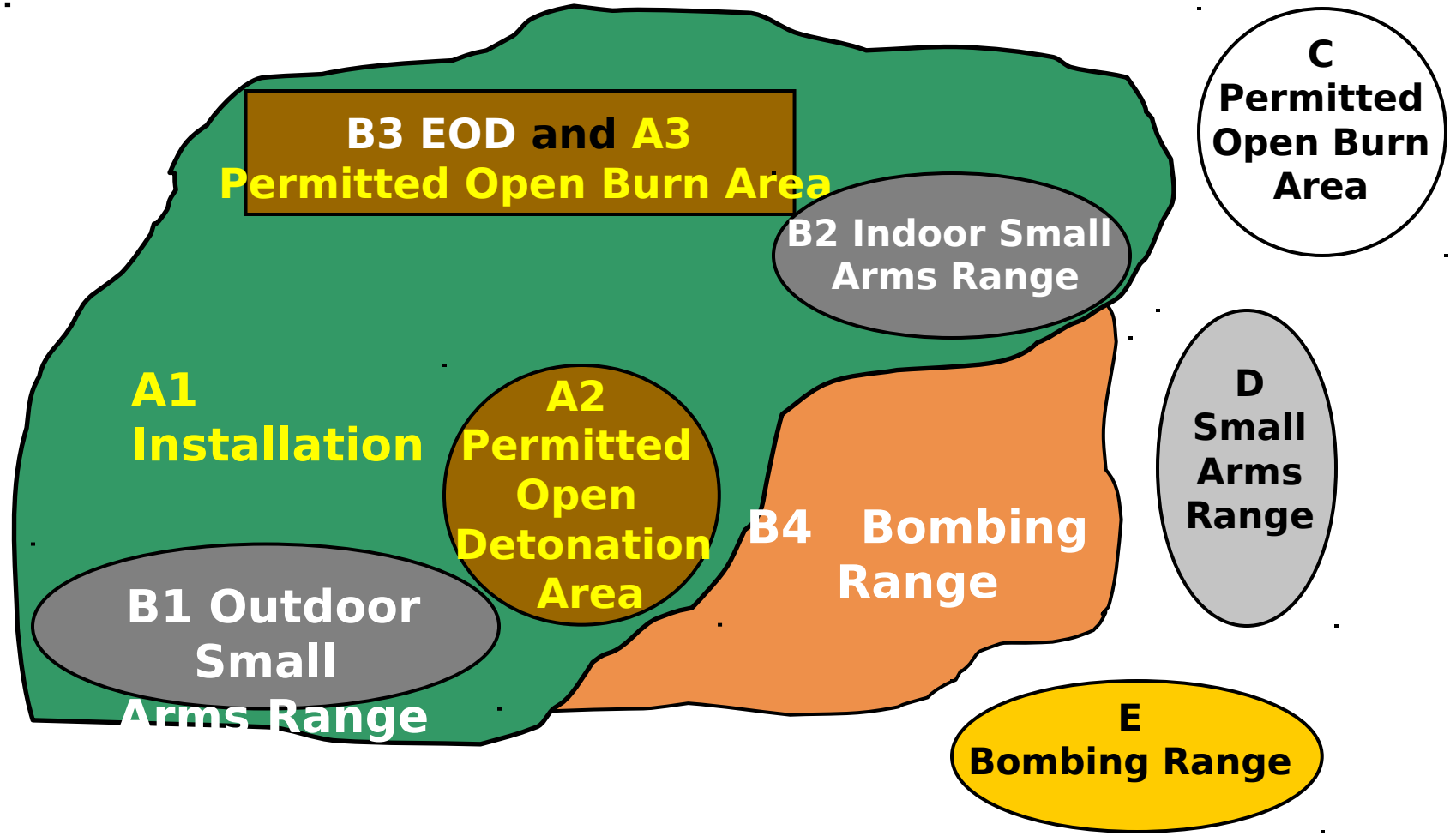

TRI-DDS - Microsoft Internet Explorer
File Edit View Favorites Tools Help
Address https://www.dod-tridds.org
www.dod-tridds.o
Department of Defense Community Right-to-Know
Toxics Release Inventory Data Delivery System
This is the supporting Web site for the Department of Defense EPCRA Toxics Release Inventory reporting database for munitions management activities.
DECEMBER 11, 2002—Currently, there is no schedule to update TRI-DDS 2001 for reporting year (RY) 2002 (reports due 1 July 2003) or present training workshops in calendar year 2003. TRI-DDS 2001 Version 3.1.1 and TRI-DDS Web are the latest versions of the system and should be used to enter munitions and range expenditure data for RY 2002. No changes to date have been made to EPA's list of toxic chemicals, thresholds, and de minimis levels during 2002, so TRI-DDS 2001 and TRI-DDS Web threshold and release calculations are currently accurate for RY 2002. Please check this web page periodically for news and updates.
JUNE 12, 2002—NEW PATCH TO CORRECT ENERGETIC COMPOSITIONS OF MUNITIONS
ALL USERS OF TRI-DDS 2001 MUST INSTALL TRI-DDS 2001 PATCH 3.1.1 to correct munitions composition data within the database. This is especially critical if your facility has exceeded the otherwise use threshold for manganese. With the patch, your facility may no longer exceed the threshold for manganese. Installing the patch WILL NOT overwrite the data you have entered into TRI-DDS. Please click here for more information and to download the patch. Once you have installed TRI-DDS 2001 Patch 3.1.1, please open TRI-DDS 2001 to recalculate thresholds and releases and regenerate the TRI Information Report (Summary) for CY 2001 to update your documentation of the threshold and release calculations.
TRI-DDS Workshops in March and April 2002
TRI-DDS 2001 will be distributed in March 2002
TRI-DDS 2000 supports both munitions demilitarization and munitions activities on
Internet

# EPCRA HOT ISSUES - Munitions and Ranges

- **Thresholds**
  - **Ranges are separate from the rest of the installation**
  - **Range Employee Threshold - 10 FTEs**
    - **Count personnel with any job related to the range**
    - **Employees do not have to be physically located ON the range to be counted**
    - **COUNT: Target maintenance/construction, range clearance sweeps, natural resource activities, range control work**

U.S. AIR FORCE

# EPCRA HOT ISSUES - Munitions and Ranges



# EPCRA HOT ISSUES - Munitions and Ranges

- **According to the DOD and AF Policy (9 Nov 01, ADUSD(E) memo):**
  - **Facility A: Main Installation**
    - **A1, A2 and A3**
  - **Facility B: Installation Ranges**
    - **B1, B2, B3 and B4**
  - **Facility C: Off-Site Open Burn Area**
  - **Facility D: Off-Site Small Arms Range**
  - **Facility E: Off-Site Bombing Range**

# EPCRA HOT ISSUES - Munitions and Ranges

| Facility | Full Time Employees | Lead Otherwise Used (lbs/yr)[1] | Copper Otherwise Used (lbs/yr)[2] | TRI From R Report Required? |
|---|---|---|---|---|
| A | 1,005 | 300 | 11,000 | Yes for Lead, Yes for Copper |
| B | 14 | 6,500 | 9,000 | Yes for Lead, No for Copper |
| C | 10 | 75 | 10,000 | No for Lead, Yes for Copper |
| D | 12 | 90 | 6,000 | No for Lead, No for Copper |
| E | 2 | 2,000 | 12,000 | No – Less than 10 FTE |

EPCRA

U.S. AIR FORCE

# HOT ISSUES - Fueling Activities

- **DUSD(ES) Memo, 13 Apr 95, exempted all fueling activities from reporting as Motor Vehicle Exemption**
- **ADUSD(E) Memo, 9 Nov 01, we will report releases associated with "TRANSIENT AIRCRAFT"**
  - **Report due Jul 2003 for activities**

# EPCRA HOT ISSUES - Transient Aircraft Fueling

- **AF Definition of "Transient"**
  - **Not under operational control of installation providing chemicals**
- **Do not include in-air refueling**
- **AF Memo detailing policy and process for calculations due out by Mar 03**

U.S. AIR FORCE

# EPCRA: New Goals

- **EO 13148 specified 50% reduction in PRIORITY LIST chemicals**
- **Interagency work group developed list**
- **Still in coordination**
- **Implementation guidance will be forthcoming**

U.S. AIR FORCE

# Training

- **Training - still under construction**
  - **AFCEE Web University**
  - **http://www.afcee.brooks.af.mil/eq/eet/**
- **Training off the net**
  - **EPA: www.epa.gov/epaoswer/hotline/modules.htm**
  - **Commercial: www.environmental-training.com**
  - **DOE: tis.eh.doe.gov/oepa/**
- **Training by Contractors**
  - **GAIA, URS, TetraTech, SAIC, others**

U.S. AIR FORCE

# References

- **Useful References:**
  - **Air National Guard EPCRA Weapons System Assessment, Feb 2002**
  - **EPCRA Munitions Reporting Handbook for the U.S. Army, May 2002**
  - **Getting Started with EPCRA: Basic Guidance for Navy Facilities, Sep 2002**
  - **Questions and Answers for EPCRA: Companion to Getting Started with EPCRA for Navy Facilities, Sep 2002**

# SUMMARY - Sections 301-303

- **Know your SERC and LEPC**
- **Determine Extremely Hazardous Substance (EHS) Thresholds are broken**
- **Report to LEPC that Installation is Subject to Emergency Planning, and Point of Contact**

# SUMMARY - Section 304

- **Provide VERBAL notification to SERC and LEPC if release occurs above the Reportable Quantity (RQ) of an EHS or CERLCA Hazardous Substance (HS)**
- **Follow-up with WRITTEN report of Actions**

# SUMMARY - Sections 311 & 312

- **311 - To the LEPC and SERC *and* local Fire Dept**
  - **Submit list of EHSs and Hazardous Chemicals (ANYTHING WITH AN MSDS) that exceed thresholds**
- **312: Submit Tier I or II form annually (1 Mar) to LEPC & SERC & local Fire Dept**
  - **EHSs and hazchems locations and amounts**

# SUMMARY - Section 313

- **Submit TRI Form R to EPA by 1 Jul annually**
  - **Report RELEASES of Toxic Chemicals that break on-site THRESHOLDS during the previous calendar year**
- **Follow DOD and AF Policy**
- **DOCUMENT EVERYTHING**

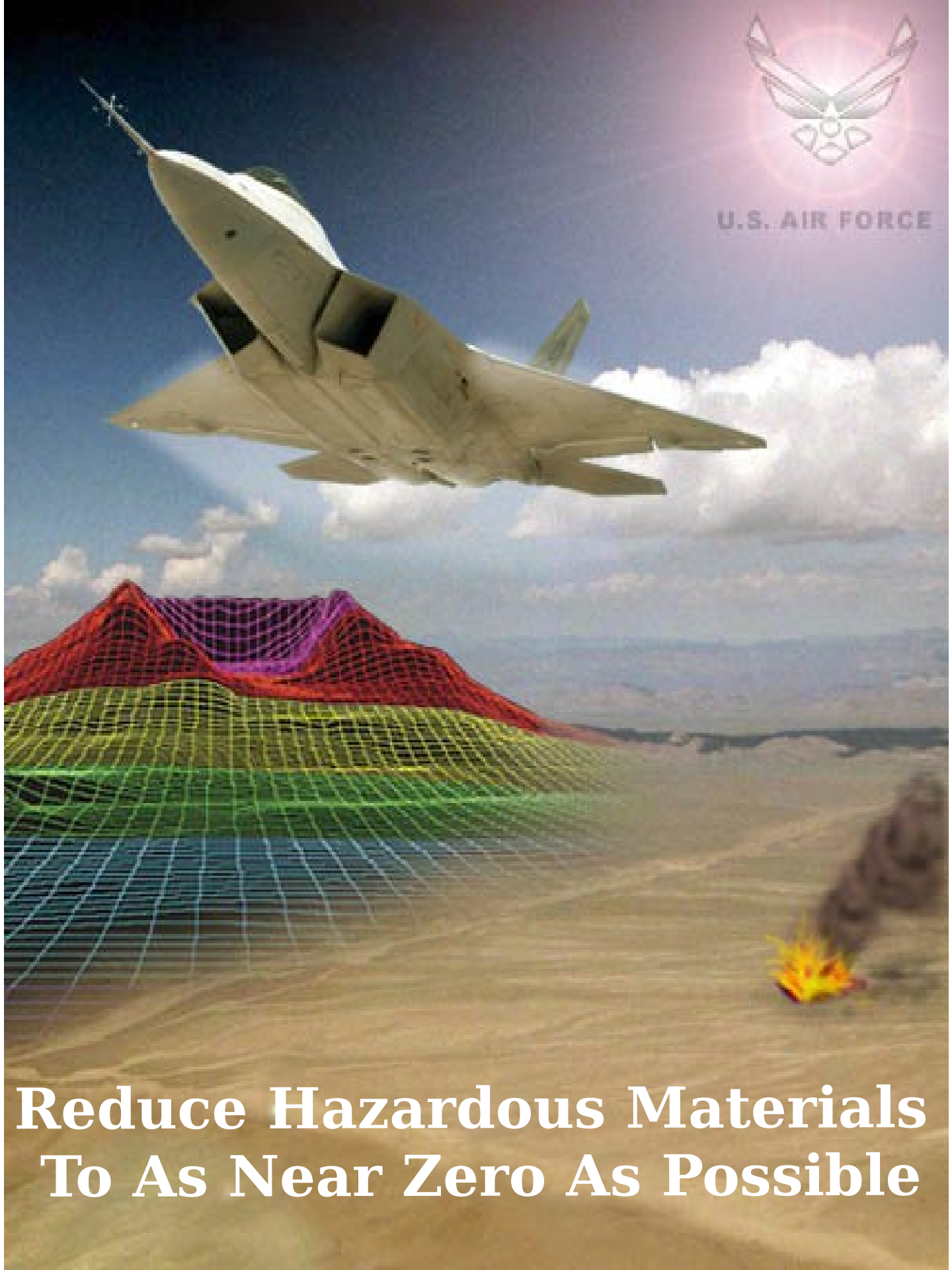
# Points of Contact

- **HQ USAF/ILEVQ, Capt Scott Mattes, 703/604-0562, scott.mattes@pentagon.af.mil**
- **HQ ACC/CEV, Rob Kemether, DSN 574-9310**
- **HQ AFSPC/CEVV, Dan Rodriguez, DSN 692-3846**
- **HQ AFMC/CEVO, David Martin, DSN 787-0106**
- **HQ AMC/CEV, Mark Horstman, DSN576-0904**
- **HQ AFRC/CEVC, Phillipe Montaigne, DSN 497-1043**
- **HQ ANG/CEVC, Nick Muszynski, DSN 278-8293**
- **HQ AFCEE/EQT, Laura Maxwell, DSN 240-4218**
- **PRO-ACT  at 1-800-233-4356**

U.S. AIR FORCE

# SUMMARY

Installations must comply with **302**, **303** and **304** of EPCRA, *as well as* **311**, **312**, and **313**




# Reduce Hazardous Materials To As Near Zero As Possible